

REMARKS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 15-19, 23-28, 32-37, and 41-56 are pending in the present application. No claims are amended, cancelled or added by the present response.

In the outstanding Office Action, claims 15-19, 23-28, 32-37, 41-43, 46-48, 51-53, and 56 were rejected under 35 U.S.C. § 103(a) as unpatentable over Daily et al. (U.S. Patent Publication No. 2004/0123320, herein "Daily") in view of Brown et al. (U.S. Patent Publication No. 2004/0070631, herein "Brown"), and claims 44, 45, 49, 50, 54 and 55 were rejected under 35 U.S.C. § 103(a) as unpatentable over Daily in view of Brown and Johnston et al. (U.S. Patent No. 5,561,444, herein "Johnston").

The rejections of the claims are respectfully traversed for the following reasons.

Briefly recapitulating, independent claim 15 is directed to a method for interfacing with a plurality of images in which each of the plurality of images represents a selectable media item. The method includes, inter alia, displaying the plurality of images aligned relative to one another in rows and columns at a first semantic level of a user interface, moving a cursor over one of the plurality of images, enlarging the one of the plurality of images in response to the cursor movement such that the one of the plurality of images overlaps at least another one of the plurality of images at the first semantic level, and displaying additional information associated with the one of the plurality of images after enlarging the one of the plurality of images and prior to

launching a media item represented by the one of the plurality of images. Independent claims 24 and 33 recite features that are similar to those of independent claim 15.

The claimed method advantageously allows a user to easily browse through plural images associated with data, to enlarge one of the images for a better view, and to provide, if the user desires, **additional information** besides the selected image as disclosed in the specification, for example, in paragraph [0075].

Turning to the applied art, Daily discloses a method and system for providing an interactive guide for multimedia selection. In this respect, Daily shows in Figures 1(a)-(b) typical views provided by the interactive guide. These figures show plural icons associated with possible services to be selected by a user. Daily discloses in paragraph [0040] that the user can navigate by panning, zooming and selecting an icon. More specifically, Daily shows in Figure 2(a) that an initial icon includes both text and images and the text is too small to be read by the user. Thus, the user can zoom in to increase the size of the text as shown in Figures 2(b)-(c).

However, it is noted that the zooming operation described by Daily in paragraph [0040] and shown in Figures 2(a)-(c) does not provide **additional information** related to the specific image of the selected icon, as required by independent claim 15. The result of the zooming operation in Daily is only an increase in size of the text information previously displayed by the original icon.

The outstanding Office Action states that Daily discloses in paragraph [0037] "providing additional information associated with the one of the plurality of images after enlarging the one of the plurality of images." However, Applicants respectfully submit

that paragraph [0037] of Daily only states that "users can zoom into visual icons and see expanded channel or program information at higher levels of detail." The zooming mentioned in this paragraph of Daily has been discussed above with reference to paragraph [0040] of Daily. Thus, the "expanded channel or program information" mentioned by Daily refers to enlarging a size of the text information and not to showing additional information as required by independent claims 15, 24, and 33.

Accordingly, Applicants respectfully submit that Daily does not teach or suggest displaying additional information associated with one of the plurality of images after enlarging the one of the plurality of images and prior to launching a media icon represented by the one of the plurality of images.

The outstanding Office Action relies on Brown for teaching selecting an image such that the image overlaps other images adjacent to the selected image. However, Brown does not cure the deficiencies of Daily discussed above with regard to independent claim 15 for the following reasons. Brown shows in Figure 5 that a selected icon 304C, after being enlarged, displays the same information that was shown prior to being enlarged (see Figures 3 and 4).

Thus, similar to Daily, Brown does not teach or suggest providing additional information associated with one of the plurality of images after enlarging the one of the plurality of images.

Therefore, it is respectfully submitted that independent claims 15, 24, and 33 and each of the claims depending therefrom patentably distinguish over Daily and Brown, either alone or in combination.

In addition, Applicants respectfully submit that there is no reason for combining the teachings of Daily with the teachings of Brown to arrive at the claimed invention as will be discussed next. It is noted that the outstanding Office Action states in the paragraph bridging pages 2 and 3, that "[i]t would have been obvious to an artisan at the time of the invention to incorporate the method of Brown with the method of Daily so that users can simultaneously view multiple images and their location for navigational purposes."

In this regard, Daily explains in paragraph [0039] that "[b]y selecting a category or provider [i.e., an icon as shown in Figure 1(a)], the interactive guide dynamically zooms into the next layer, displaying the contents of that 'node' within the database of the data sources as a panel such as that shown in **FIG 1(a)**." (Underline added).

On the contrary, Brown shows in Figures 4 and 5 that when an icon (category) is selected from a plurality of icons 304A-H, a user remains at the same layer and only the selected icon is enlarged without zooming into a next layer.

Therefore, Applicants respectfully submit that these teachings of Daily and Brown cannot be combined as suggested by the outstanding Office Action as these teachings are opposite to each other, i.e., Daily suggests advancing from a first layer to a second layer when an icon is selected and Brown suggests remaining at the same layer when an icon is selected and only increasing the size of the icon.

Thus, the reasoning provided by the outstanding Office Action to modify the teachings of Daily based on the teachings of Brown so that a user can simultaneously view multiple images and their locations is inaccurate as Daily does not desire to view

multiple images when an icon is selected but rather intends to advance to a next layer for showing information associated with the selected icon.

Accordingly, it is respectfully submitted that the combination of Daily and Brown is improper for the reasons discussed above.

Johnston has been considered but does not cure the deficiencies of Daily and Brown discussed above with regard to independent claims 15, 24, and 33. Thus, Applicants respectfully submit that claims 44, 45, 49, 50, 54 and 55, which depend from independent claims 15, 24, and 33, also patentably distinguish over Daily, Brown, and Johnston, either alone or in combination.

Regarding dependent claim 43, this claim recites providing a transition effect between the display of the one of the plurality of images at the first semantic level and the display of an image of the plurality of images at the second semantic level. The outstanding Office Action considers that Daily discloses this feature in paragraphs [0039], [0049], [0054] and [0055]. However, as discussed above, Daily discloses in paragraph [0039] that upon selection of an icon, the system advances to a next layer and is silent about a transition effect between the display of different images. In paragraph [0049], Daily only discloses a hardware configuration of the device shown in Figure 4 and no transition effect between the display of two different images. Finally, Daily discloses in paragraph [0054] a zoom-in command and in paragraph [0055] a zoom-out command and no transition effect between the display of different images.

Accordingly, it is respectfully submitted that dependent claim 43 also patentably distinguishes over Daily and Brown, either alone or in combination.

Consequently, in light of the above discussion, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested. Should the Examiner have any questions regarding this response or the application in general, she or he is invited to contact the undersigned at (540) 361-2601.

Respectfully submitted,

POTOMAC PATENT GROUP PLLC

By: 

Remus F. Fetea, Ph.D
Registration No. 59,140

Date: December 5, 2007

Customer No. 42015
Potomac Patent Group PLLC
P.O. Box 270
Fredericksburg, VA 22404
(540) 361-1863